

This comment concerns requests for rulemaking RM-10781, RM-10782, RM-10783, RM-10784, RM-10785, RM-10786, and RM-10887.

Code of Federal Regulations (CFR) Part 97.1(a) states that a purpose of the Amateur Radio Service is "Recognition and enhancement of the value of the amateur service to the public as a voluntary noncommercial communication service, particularly with respect to providing emergency communications." The contribution of Amateur Radio to emergency communications has been aptly demonstrated in the 9/11 terrorist attacks, 2002 Arizona wildfires, loss of the Columbia Space Shuttle, electric power shutdown in the northeast last August, and recent Hurricane Isabel. While most communications for these emergencies were conducted by voice, there are plenty of examples through the years of amateur operators that have been forced to communicate emergency messages via International Morse Code (CW) under low power or with damaged radio systems. Indeed, loss of local electric power and damaged equipment are conditions that frequently occur at the site of natural disasters. If the Amateur Radio Service is to continue to provide the emergency communication service stated in Part 97.1(a) of the Federal Regulations we must ensure that amateur operators are skilled in communicating in many data modes, especially those that might occur under less than optimal conditions such as low power. CW is a mode that works well under low power and with fairly crude equipment---just the sort of circumstance that might occur in an emergency. Do we want to train a generation of amateur radio operators for emergency communication who cannot recognize and respond to an SOS? Not requiring some skill in CW is counter to the purpose of providing amateur service to the public in emergency communications.

Code of Federal Regulations (CFR) Part 97.1(c) states that another purpose of the Amateur Radio Service is "Encouragement and improvement of the amateur service through rules which provide for advancing skills in both the communication and technical phases of the art." As long as there has been amateur radio there has been communication by CW. It is the common thread that links the communication skills of all technically advanced amateur operators. The emphasis on CW mode has changed through time with advances in radio equipment. The FCC has recognized this reduction in emphasis on CW by reducing the testing requirement to a single five word per minute exam. Opponents of CW testing claim CW is an obsolete mode they will never use, so they shouldn't be required to learn it. If that logic were correct, there should be no questions on the written portion of amateur tests that relate to theory of transmitter and amplifier operation. After all, most amateur radio operators now purchase commercial equipment and never open their transceiver cases to mess with the electronics. For the most part, they do not build their equipment as was necessary 60 years ago when that was the main method to get on the air. Today's transceivers are commodity electronic appliances like microwave ovens and televisions that require electronic diagnostic equipment and skills for repair or modification beyond that necessary for a two-tube transmitter. But it would be foolish not to include basic transmitter and amplifier theory on amateur radio exams since it is a backbone of the knowledge that is needed for advancing the skills of amateur operators. My late mother drove an automobile for 68 years. In that time she never parallel parked, not even once. She would go around the block many times until she found an empty slant-in space, or until she found a parking garage where an attendant would park her car. Using the logic of CW opponents, she should have never been tested on parallel parking since she was never going to use it. Of course, that is absurd; she chose never to use parallel parking. Amateur radio exams, like driving tests, are meant to test the skills one must have for situations that are experienced in the real world. The opponents of CW say they choose never to use CW but I suspect they encounter it frequently when they hear the CW station identification on 2-meter

repeaters they listen to while they drive. If they participate in the Radio Amateur Civil Emergency Service I suspect they would be devastated if they failed to respond to an SOS or simple emergency message in CW from a person in need. Stopping all testing for CW will eliminate CW as a skill for new amateur radio operators; there will be no incentive for new operators to learn CW and achieve the very modest skill level currently required. Part 97.1(c) of the Federal Regulations says that a purpose of the Amateur Service is to advance skills of operators. Eliminating a skill among the population of new amateur operators is hardly advancing their skills. Thus, the proposals to eliminate CW testing are inconsistent with the purpose stated in Part 97.1(c) of the Federal Regulations.

Code of Federal Regulations (CFR) Part 97.1(e) states that another purpose of the Amateur Radio Service is "Continuation and expansion of the amateur's unique ability to enhance international goodwill." Using CW, abbreviations, and Q signals, an American amateur operator can converse with foreign operators in many countries even though neither can speak the other's language. That is because CW used in this manner is a common language to both parties. Few American amateur operators today speak foreign languages and the trend for foreign language skills among Americans continues to decline. Removing the CW testing requirement will eliminate the incentive for new American amateurs to learn CW and thereby further decrease the ability of American amateur operators to communicate with foreign amateurs. The essence of promoting international goodwill is tied to the ability of two individuals to communicate with each other. Removing the incentive to learn CW will decrease the ability of American Operators to communicate with foreign operators which will in turn reduce American amateur's ability to enhance international goodwill, in direct contradiction of the purpose of Part 97.1(e) of the Federal Regulations.

Most of the individuals or groups opposing CW testing claim it is an obsolete skill they will never use. Yet it has deep historical roots in the amateur radio service and has practical utility for any amateur operator in emergencies or when conditions do not permit voice operation. Eliminating testing of CW removes the incentive for people to learn the skill and guarantees that the skill will wither and die. The Basis and Purpose of the Amateur Service defined in Part 97.1 of the Federal Regulations emphasizes providing public service especially through emergency communications, advancing the art of radio communications, advancing the communication and technical skills of operators, advancing the reservoir of skilled operators, and enhancing international goodwill through communication. None of these purposes are enhanced by the elimination of a basic skill like CW. In fact, all of the purposes are diminished by elimination of the incentive to learn this basic skill.

The medical doctor I go to for my allergy does not do surgery. He does not need to know how to identify my fifth cranial nerve or the sphenoid bone in my skull. But no competent medical school or residency program would let him graduate and practice his specialty without that knowledge of anatomy. It is part of the entire package of a well-rounded, complete medical education. It has historical roots that gives the physician perspective in his art, and provides for the unforeseen circumstance in the future where he may need that knowledge. Medical education provides the incentive to learn that information up front, so the doctor does not have to stop to learn it at a later time when he may need the skill quickly.

We have a similar situation in amateur radio. Passing a CW exam shows that a person has reached a minimal level of skill and provides a background in a traditional skill linking the individual to 150 years of communication

experience. It trains a person to understand various things he or she hears on the radio that would otherwise not be known, and it provides a skill that at some unforeseen time in the future could save life or property. Should this skill be eliminated just because a few people do not want to learn it? The answer is obviously no. The rules of the FCC are aimed at encouraging individuals to sharpen and improve their skills. The statement of the Basis and Purpose of the Amateur Service show that the FCC intends for amateur operators to have a well-rounded, complete knowledge of communication and technical phases of the radio art. The levels of licensing are incentives: improve your skills and you expand your privileges.

The response of the FCC to requests to eliminate CW testing should be "Get over it!" Demonstrating a modest level of CW skill is a requirement for well-rounded education in amateur radio. CW is part of the heritage and lore of amateur radio, it continues to be an active operating mode, and is one of the methods of communication that requires minimal equipment and power to transmit a signal a message under emergency conditions. Let's face it, five words per minute is not a very taxing requirement. It amounts to slightly less than one character every two seconds. With tapes, code practice programs for PC's, and self-contained electronic code tutors that are available, all kinds of people---from five year old children to 85 year old grandmothers---have been able to learn enough code to pass the CW test. All it takes is a little perseverance and effort. In the final measure, this may be the point of CW testing altogether: if CW testing opponents are unwilling to take the time and effort to develop the skill to communicate at five words per minute, it is a clear sign that they are probably unwilling to do the other things necessary to become a full member of the amateur radio community. Their failure to embrace and learn the traditional skills of amateur radio probably shows that they only want the perks and not the responsibilities of membership.

The FCC has done a good job of partitioning the requirements for skills and knowledge with incentives of the three-tiered incentive licensing system. The system is not broken and does not need to be fixed. There is no reason to make any changes in the current status of licensing irregardless of the recent position of the International Amateur Radio Union on CW testing. However, elimination of CW testing would be inconsistent with the FCC's stated Basis and Purpose of the Amateur Radio Service in Part 97.1 of the Federal Regulations.

Sincerely,

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